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February 3, 2025

VIA ECF

The Honorable Lewis J. Liman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Tavon Turner v. Deep Roots Harvest, Inc.*
Case No. 1:24-cv-08333-LJL-SDA

Dear Judge Liman,

We represent defendant Deep Roots Harvest, Inc. in this case. We write, pursuant to Paragraph 1(D) of Your Honor's Individual Practices in Civil Cases and with Plaintiff's consent, to respectfully request an extension of time of thirty days for Defendant to answer, move, or otherwise respond to the complaint and an attendant adjournment of the initial pretrial conference to a date after Defendant's response, available to the Court.

Counsel for the parties have been in communications aimed toward an amicable resolution of this case, without the need for further court intervention. Simply put, more time is needed for those communications to continue and hopefully conclude. This is Defendant's third request for an extension of time to respond to the complaint. The prior requests have been granted. We would have made the instant request earlier but wanted to ensure that we had secured Plaintiff's consent. This is Defendant's first request for an adjournment of the initial pretrial conference. Should the requested extension and adjournment be granted, no other dates or deadlines in this case would be affected.

The parties greatly appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ David J. Grech

David J. Grech
Andrew J. Varvaro

Cc.: All attorneys of record *via* ECF